

# **U.S. EPA HAZARDOUS AND SOLID WASTE AMENDMENTS (HSWA) FEDERAL CORRECTIVE ACTION PERMIT RENEWAL FACT SHEET**

**FACILITY:** International Paper Company  
1633 South First Street  
Wiggins, Mississippi 39577  
EPA I.D. Number: MSD 980 600 084

**PERMITEE:** International Paper Company

## **I. INTRODUCTION**

This Fact Sheet is prepared for a federal draft permit developed by the U.S. Environmental Protection Agency (EPA) Region 4 pursuant to the 1984 Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA). The EPA invites the public to review and comment on the draft HSWA Permit written for International Paper Company (hereafter called the “Permittee”), which, until 2007, owned and operated a facility located at South First Street, Wiggins, Mississippi (the Facility). Baldwin Pole Mississippi, LLC is the current operator and part owner of the Facility. See Figure 1 for a depiction of the Facility property. The EPA I.D. Number for this Facility is MSD 980 600 084. This draft HSWA Permit renews the HSWA Permit originally issued on January 4, 1993, and administratively continued pursuant to 40 C.F.R. § 270.51.

In Mississippi, implementation of the environmental permitting regulations under RCRA is shared between the Mississippi Department of Environmental Quality (MDEQ) and the EPA. The State of Mississippi has been authorized by the EPA to issue permits for the operation, closure, and post-closure care of Hazardous Waste Management Units (HWMUs), while the EPA retains authority to issue permits requiring corrective action for releases from Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs). SWMUs are any units which have been used for the treatment, storage or disposal of solid waste at any time, irrespective of whether the unit is or was intended for the management of solid waste. AOCs are areas having a probable release to the environment of a hazardous waste or hazardous constituent which is not associated with a SWMU and is determined to pose a current or potential threat to human health or the environment.

The EPA HSWA Permit is a companion permit to the MDEQ Post-Closure Permit issued in 2010 covering the post-closure care of several former HWMUs, including cooling ponds and sludge pits.

## **II. REQUEST FOR PUBLIC COMMENTS**

The draft HSWA Permit, which is explained in Sections V through VII below, is subject to change based on information received as a result of public participation. Therefore, the EPA is soliciting all relevant information, including public comment, to ensure that the draft HSWA

Permit complies with all state and federal regulations. Any and all comments are encouraged by the public. The forty-five (45) day public comment period begins on **May 26<sup>th</sup>**, and ends at midnight on **July 12<sup>th</sup>**. Persons wishing to comment on the draft HSWA Permit during the 45-day public notice and comment period are invited to submit comments in writing to:

Maher Budeir  
U.S. EPA – Region 4  
Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, GA 30303  
(404) 562-9514  
[budeir.maher@epa.gov](mailto:budeir.maher@epa.gov)

For additional information on the draft HSWA Permit and its requirements, the public is encouraged to review the Administrative Record for the draft HSWA Permit, which is available at the locations listed in Table 1 below.

| Local*   | EPA   | Online   |
|--|---|--|
| <p>Stone County Library<br/>242 2nd Street S.<br/>Wiggins, MS 39577<br/>(601) 928-4993<br/>Hours:<br/>Mon. – Fri. 8:30 a.m. to 5:30 p.m.<br/>Documents available to review by appointment only. Call in advance to schedule an appointment.</p> <p>Closed: Saturday and Sunday</p> <p>*Availability of local repository could be limited due to local COVID-19 restrictions.</p> | <p>U.S. EPA – Region 4<br/>Atlanta Federal Center<br/>61 Forsyth Street, SW<br/>Atlanta, GA 30303<br/>Hours*:<br/>Mon – Fri 9:00 a.m. to 3:00 p.m., Eastern Time<br/>*Appointments are required at least two weeks in advance and adherence to Covid-19 protocols is required.</p> <p>EPA Contact: Maher Budeir<br/>RCRA Programs and Cleanup Branch<br/>(404) 562- 9514<br/><a href="mailto:budeir.maher@epa.gov">budeir.maher@epa.gov</a></p> | <p><a href="https://semspub.epa.gov/src/collection/04/AR66823">https://semspub.epa.gov/src/collection/04/AR66823</a></p> |
|  | <b>STATE</b>  |  |
|  | <p>Mississippi Department of Environmental Quality<br/>515 East Amite Street<br/>Jackson, MS 39202<br/>Hours:<br/>Mon. – Fri. 8:00 a.m. to 5:00 p.m.</p> <p>Contact Deidre Thompson to arrange for viewing files on record at MDEQ.<br/>Phone: (601) 961-5758<br/>Email: <a href="mailto:dthompson@mdeq.ms.gov">dthompson@mdeq.ms.gov</a></p>   |  |

### **III. PUBLIC MEETING/HEARING**

No public meeting is currently scheduled at this time, but the public can request a formal public hearing on the draft HSWA Permit. Such a request must be made in writing and must state the nature of the issues to be raised during the hearing. Requests must be submitted to Maher Budeir at the EPA via email ([budeir.maher@epa.gov](mailto:budeir.maher@epa.gov)) or at the address listed in Section II above, and must be postmarked/sent by the deadline for the public comment period. If a public hearing is held, the time and place of the hearing will be published at least thirty (30) days prior to the hearing.

### **IV. POST PUBLIC COMMENT PERIOD – FINAL DECISION**

The EPA will not finalize its decision until after review of and response to all received written comments. After the EPA's consideration of the public comments that are received, the comments will be summarized, and responses will be provided in a Response to Comments (RTC) document. The RTC document will be drafted after the conclusion of the public comment period and will be incorporated into the Administrative Record for the HSWA Permit. Issuance of the final permit will be in accordance with 40 C.F.R. § 124.15. All persons submitting comments will be notified of the EPA's final decision. The final permit decision shall become effective thirty (30) days after the service of notice of the decision unless a later date is specified or review is requested under 40 C.F.R. § 124.19. If no comments are received requesting a change in the draft permit, the final permit shall become effective immediately upon issuance.

### **V. SUMMARY OF HSWA PERMIT**

This draft HSWA Permit contains the following components:

➤ **HSWA Permit Cover Page**

The Cover Page cites authority for issuance of the HSWA Permit and establishes the term of the permit, which is ten (10) years.

➤ **PART I. Standard Permit Conditions**

Part I of the HSWA Permit sets forth standard conditions applicable to all hazardous waste management facilities (e.g., duty to comply, duty to allow access, etc.). Each Condition specifies the exact authority to require the Permittee's compliance with the Condition. Unless otherwise specified, all citations refer to the regulations as codified in Title 40 of the Code of Federal Regulations (40 C.F.R.). Mississippi has incorporated these federal regulations by reference and they have been authorized as part of the Mississippi Hazardous Waste Program at 11 Miss. Admin. Code Pt. 3, Ch. 1.

➤ **PART II. Corrective Action**

Part II of the HSWA Permit sets forth the specific corrective action requirements with which the Permittee must comply to address releases from SWMUs and AOCs that have

been identified at the Facility. Specifically, HSWA permits can require any of the following corrective action activities for any SWMUs or AOCs:

- **Confirmatory Sampling** to determine if a release has occurred.
- A **SWMU Assessment Report** to report and/or investigate a newly identified SWMU.
- **RCRA Facility Investigation** to determine the scope and extent of a release.
- **Interim Measures** to minimize or prevent further contamination or exposure while long-term remedies are evaluated.
- **Corrective Measures Study** to identify and evaluate potential remedial alternatives for the releases that have been identified at the Facility.
- A **Remedy** to implement corrective measures necessary for the protection of human health and the environment.

The authority to investigate/clean up contamination from SWMUs or AOCs extends to contamination on-site, as well as to contamination that has migrated off-site from the Facility.

## **VI. FACILITY BACKGROUND**

### Facility Description

The former International Paper Treated Wood Products Plant in Stone County, Mississippi is located approximately two (2) miles south of the town of Wiggins. The plant, which has been operating since December 1969, was sold to Baldwin Pole Mississippi, LLC (Baldwin Pole) on January 31, 2007. The overall manufacturing operations at the time of the sale comprised 88 acres of a larger 180-acre property. At the time of the sale, the property was sub-divided and a 92-acre portion containing the closed HWMUs was retained by International Paper Company (IPCo). The entire 180-acre parcel comprises the permitted Facility.

### Waste Management

Since 1969, the Facility generated waste from its creosote, pentachlorophenol (PCP), cellon, and chromated copper arsenic (CCA) processes. This waste was managed in surface impoundments (SWMUs 7-10), sludge pits (SWMUs 2-6), and a Land Treatment Demonstration Unit (SWMU 1). Prior to 1986, the four surface impoundments (SWMUs 7-10) were used in the recovery of preservatives from the wood treatment process effluent. These impoundments contained the listed hazardous waste stream K001 (bottom sediment sludge from the treatment of wastewaters from wood preserving processes that used creosote and/or PCP). Because they were in service after January 26, 1983 and managed listed hazardous waste, and because the sludge pits were used in conjunction with the surface impoundments, the impoundments and the sludge pits are HWMUs and considered “regulated units” under 40 C.F.R. § 264.90.

### Regulatory History

As referenced above, the implementation of the environmental regulations under RCRA has been split between the State of Mississippi and the EPA. Because the State of Mississippi does not have authorization to administer the corrective action requirements of HSWA, the EPA issues

and administers the HSWA portion of the RCRA Permit for the Facility. The State's portion of the Permit covers operating HWMUs, closure, and post-closure care.

Between 1986 and 1990, the impoundments and sludge pits were closed in accordance with the closure plan included in IPCo's 1984 permit application, as amended on October 30, 1989. During the development of IPCo's amended closure plan, a Land Treatment Demonstration Unit (SWMU 1) was constructed to evaluate the effectiveness of the bioremediation of soils containing wood preserving chemicals. The MDEQ Permit was modified on September 3, 1987 to include this unit, which operated from 1987 to 1990. It was closed through the installation of a low permeability cover.

The MDEQ Permit was last renewed in 2010 and it addresses post-closure care of the all the impoundments, sludge pits, and the Land Treatment Demonstration Unit (SWMUs 1-10). This permit also addresses groundwater contamination.

The EPA first issued the HSWA portion of the RCRA Permit in 1993. The EPA HSWA Permit addresses all other SWMUs and AOCs that have been identified in the investigation process. This Permit is a renewal of the 1993 Permit (which has been administratively continued pursuant to 40 C.F.R. § 270.51). This Permit incorporates all the SWMUs and AOCs identified at the entire Facility to date. Some SWMUs have undergone early removal actions and have now been determined to require no further action, but others are subject to ongoing investigations, interim measures, and potential remedial action as discussed below. This Permit also specifies the status of each SWMU or AOC as of the date of the Permit renewal (see Table 2 below). See Figure 2 for the general locations of Facility SWMUs and AOCs.

### Geology/Hydrogeology

Soils of the Citronelle and Pascagoula formations have been encountered beneath the Facility during site investigations and are consistent with regional geological descriptions. Soils of the shallower Citronelle Formation encountered at the Facility have consisted primarily of silty fine-to-gravelly sands and silty clay with varying amounts of sand. During previous investigations, the Pascagoula Formation was encountered at depths ranging from approximately 94 to 127 feet below ground surface (bgs). Soils of the Pascagoula Formation were documented as consisting primarily of stiff to very hard sandy clayey silt to silty clay with occasional thin gravel, sand, or silty sand layers in the upper portions of the formation. Silty sands, sandy silts, and sands were present at greater depths. The Pascagoula Formation was encountered in each boring advanced to a depth of greater than 90 feet bgs and appears to be laterally extensive beneath the Facility.

The Citronelle Formation is the uppermost water-bearing zone beneath the Facility and occurs under unconfined conditions. The groundwater flow direction in the Citronelle Formation is generally toward the south based on potentiometric maps constructed using the network of existing groundwater wells at the Facility.

## **VII. SUMMARY OF CORRECTIVE ACTION REQUIREMENTS**

In 1991, a RCRA Facility Assessment (RFA) was conducted by an EPA contractor. The RFA identified 39 SWMUs and two AOCs at the Facility. The EPA's original corrective action HSWA Permit was issued in 1993. Confirmatory Sampling was performed in 1996 at 37 SWMUs and two AOCs. In July 1998, the EPA requested that IPCo perform a RCRA Facility Investigation (RFI). The RFI was completed in 2002 and incorporated early removal actions at SWMUs 16 through 20. A preliminary Corrective Measures Study (CMS) Report was submitted to the EPA in 2005. Subsequent CMS reports were submitted in 2015 and 2017. In 2017, the EPA conducted surface soil sampling within Treatment Areas No. 1 and No. 2 (depicted on the map attached as Figure 3), which revealed surface soil contamination (PCP and arsenic) above industrial standards. Upon recent evaluation of groundwater data, the EPA requested additional groundwater investigation to fill gaps in groundwater data. At the time of this proposed permit renewal, this investigation is ongoing, as is the Ecological Risk Assessment for Church House Branch (AOC B).

Figure 1 – RCRA Facility Layout

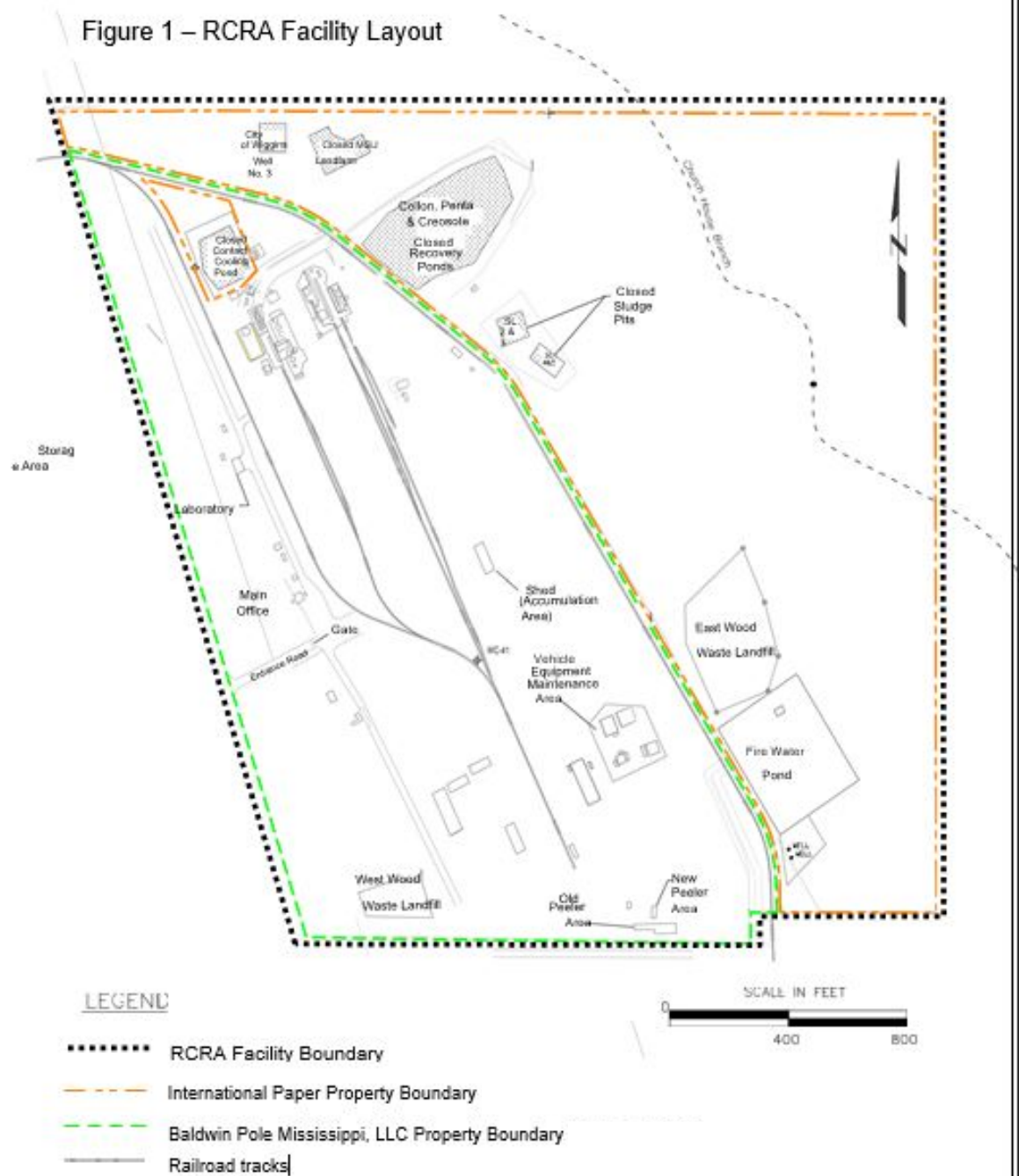




Figure 2: SWMU and AOC locations

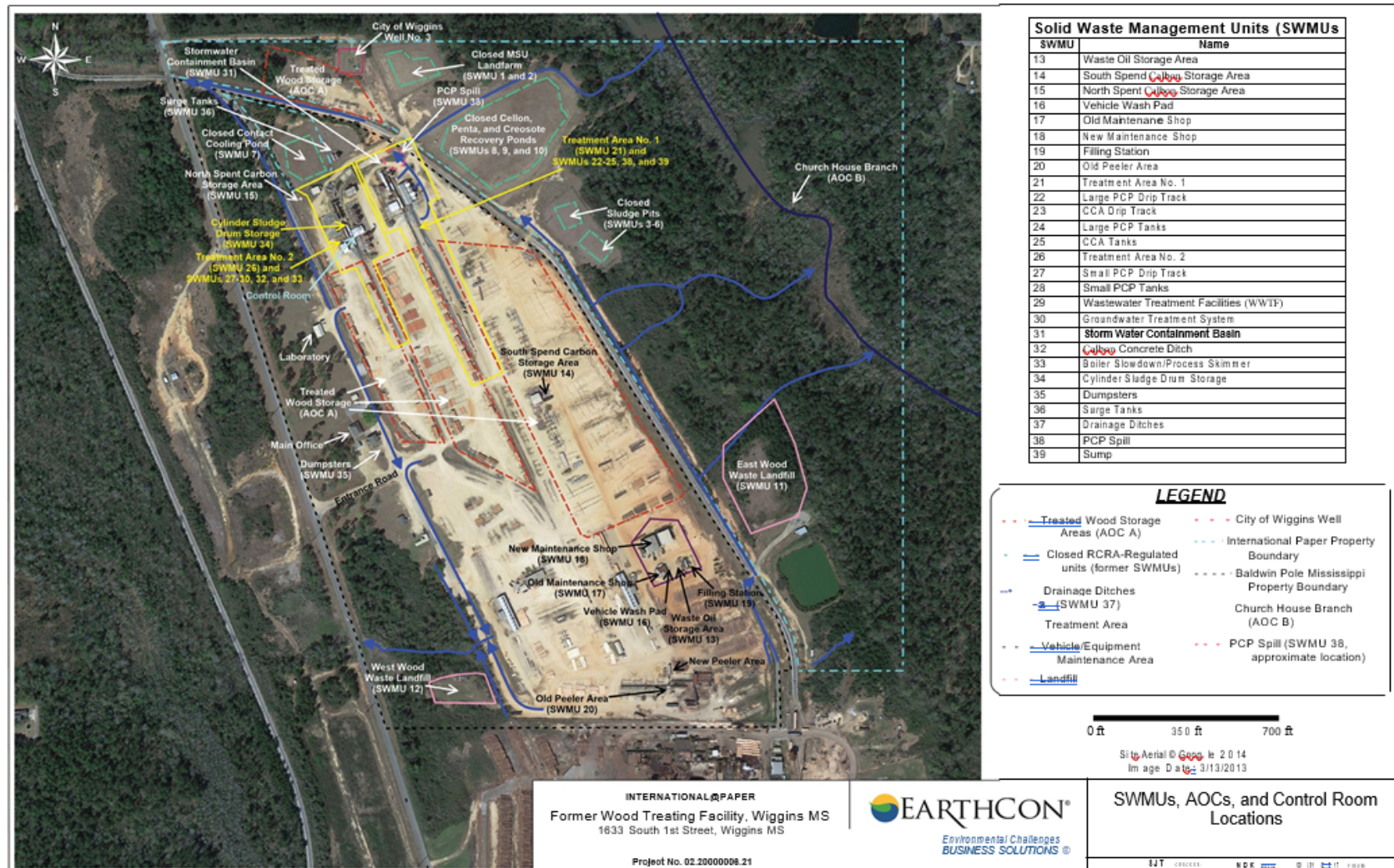
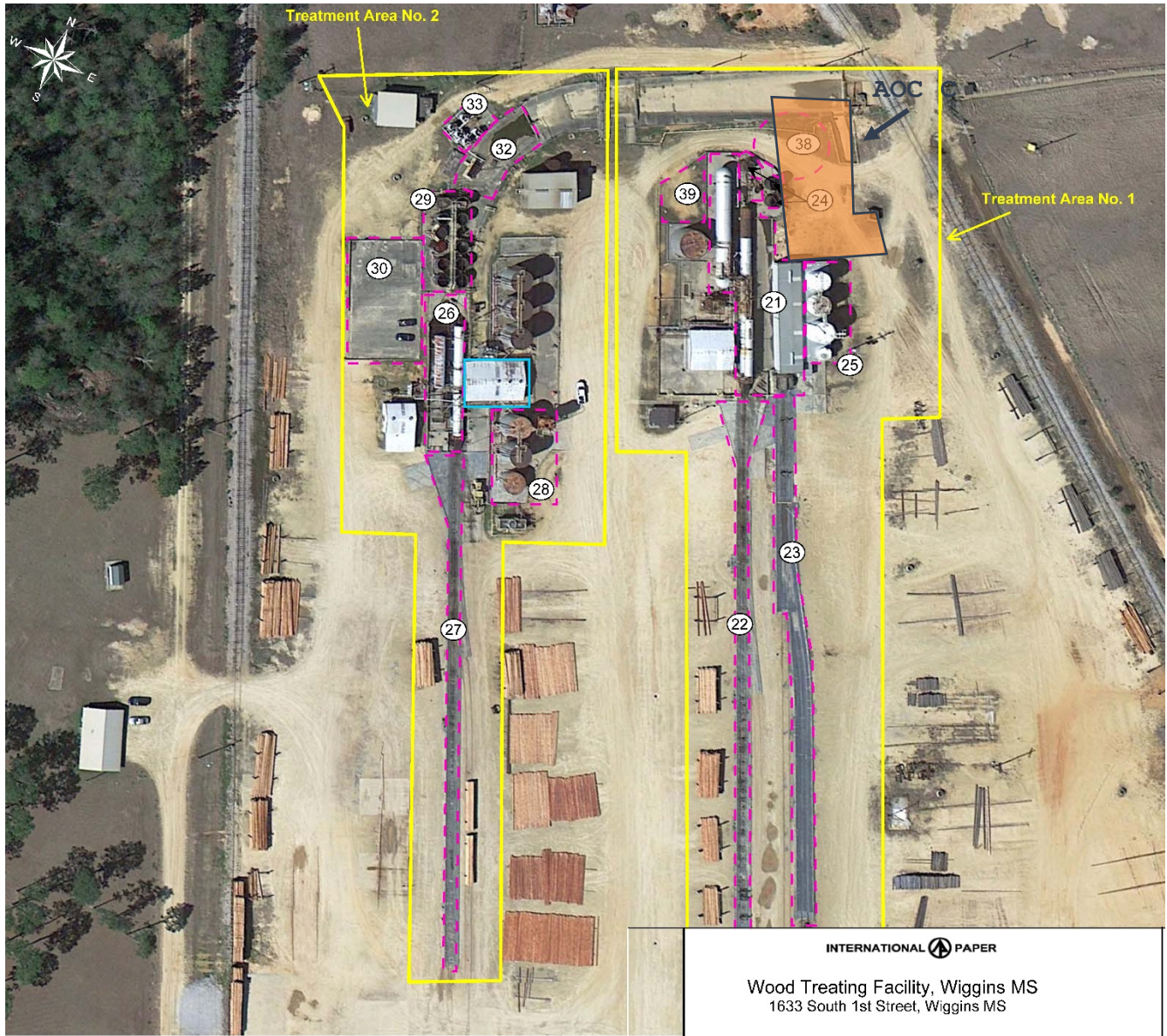




Figure No. 3. SWMUs in Treatment Areas No. 1 and 2



**Table 2: List and status of SWMUs and AOCs**

| <b>SWMU/<br/>AOC</b> | <b>SWMU/AOC<br/>Name</b>                | <b>Area<br/>(if<br/>applicable)</b> | <b>MDEQ Post-<br/>Closure Permit</b>                     | <b>No Further<br/>Action (NFA) /<br/>Basis for NFA</b> | <b>RCRA Facility<br/>Investigation (RFI)</b> | <b>Interim Measures<br/>(IM)</b> | <b>Corrective<br/>Measures Study<br/>(CMS)</b> |
|----------------------|---|-------------------------------------|--|--|--|----------------------------------|--|
| 1                    | Land Treatment<br>Demonstration<br>Unit |                                     | Subject to Post-<br>Closure Care<br>under MDEQ<br>Permit |  |  |                                  |  |
| 2                    | Sludge Pit No. 1                        |                                     | Subject to Post-<br>Closure Care<br>under MDEQ<br>Permit |  |  |                                  |  |
| 3                    | Sludge Pit No. 2                        |                                     | Subject to Post-<br>Closure Care<br>under MDEQ<br>Permit |  |  |                                  |  |
| 4                    | Sludge Pit No. 3                        |                                     | Subject to Post-<br>Closure Care<br>under MDEQ<br>Permit |  |  |                                  |  |
| 5                    | Sludge Pit No. 4                        |                                     | Subject to Post-<br>Closure Care<br>under MDEQ<br>Permit |  |  |                                  |  |
| 6                    | Sludge Pit No. 5                        |                                     | Subject to Post-<br>Closure Care<br>under MDEQ<br>Permit |  |  |                                  |  |
| 7                    | Contact Cooling<br>Water Pond           |                                     | Subject to Post-<br>Closure Care<br>under MDEQ<br>Permit |  |  |                                  |  |
| 8                    | Creosote<br>Recovery Pond               |                                     | Subject to Post-<br>Closure Care<br>under MDEQ<br>Permit |  |  |                                  |  |

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|----------------------|---------------------------------------|-------------------------------------|--|---|--|----------------------------------|--|
| 9                    | PCP Recovery<br>Pond                  |                                     | Subject to Post-<br>Closure Care<br>under MDEQ<br>Permit |   |  |                                  |  |
| 10                   | Cellon<br>Recovery Pond               |                                     | Subject to Post-<br>Closure Care<br>under MDEQ<br>Permit |   |  |                                  |  |
| 11                   | East Wood<br>Waste Landfill           |                                     |  | Closed in 1991<br>under MDEQ<br>oversight; 1993<br>HSWA Permit<br>determined NFA  |  |                                  |  |
| 12                   | West Wood<br>Waste Landfill           |                                     |  | Closed in 1991<br>under MDEQ<br>oversight; 1993<br>HSWA Permit<br>determined NFA  |  |                                  |  |
| 13                   | Waste Oil<br>Storage Area             |                                     |  | Addressed by<br>National Pollutant<br>Discharge<br>Elimination<br>System (NPDES)<br>Permit issued by<br>MDEQ; 1993<br>HSWA Permit<br>determined NFA |  |                                  |  |
| 14                   | South Spent<br>Carbon<br>Storage Area |                                     |  | Waste removed in<br>1986 and 1987;<br>1993 HSWA<br>Permit determined<br>NFA   |  |                                  |  |
| 15                   | North Spent<br>Carbon<br>Storage Area |                                     |  | Waste removed in<br>1986, 1987, and<br>1990; 1993   |  |                                  |  |

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| <b>SWMU/<br/>AOC</b> | <b>SWMU/AOC<br/>Name</b>   | <b>Area<br/>(if<br/>applicable)</b> | <b>MDEQ Post-<br/>Closure Permit</b> | <b>No Further<br/>Action (NFA) /<br/>Basis for NFA</b>                 | <b>RCRA Facility<br/>Investigation (RFI)</b>                         | <b>Interim Measures<br/>(IM)</b> | <b>Corrective<br/>Measures Study<br/>(CMS)</b> |
|----------------------|----------------------------|-------------------------------------|--------------------------------------|--|--|----------------------------------|--|
|                      |                            |                                     |                                      | HSWA Permit<br>determined NFA  |  |                                  |  |
| 16                   | Vehicle Wash<br>Pad        |                                     |                                      | Waste removed in<br>1988; NFA based<br>on 2002 RFI                     |  |                                  |  |
| 17                   | Old<br>Maintenance<br>Shop |                                     |                                      | Closed in 1987;<br>Removal Action<br>in 2001; NFA<br>based on 2002 RFI |  |                                  |  |
| 18                   | New<br>Maintenance<br>Shop |                                     |                                      | Removal Action<br>in 2001; NFA<br>based on 2002 RFI                    |  |                                  |  |
| 19                   | Filling Station            |                                     |                                      | Removal Action<br>in 2001; NFA<br>based on 2002 RFI                    |  |                                  |  |
| 20                   | Peeler Area                |                                     |                                      | Removal Action<br>in 2001; NFA<br>based on 2002 RFI                    |  |                                  |  |
| 21A                  | Large PCP<br>Cylinder      | Treatment<br>Area No. 1             |                                      |  | Supplemental RFI<br>required for surface<br>soils and<br>groundwater |                                  |  |
| 21B                  | CCA Cylinder               | Treatment<br>Area No. 1             |                                      |  | Supplemental RFI<br>required for surface<br>soils and<br>groundwater |                                  |  |
| 21C                  | CCA Overflow<br>Pit        | Treatment<br>Area No. 1             |                                      |  | Supplemental RFI<br>required for surface<br>soils and<br>groundwater |                                  |  |
| 21D                  | Large PCP<br>Overflow Pit  | Treatment<br>Area No. 1             |                                      |  | Supplemental RFI<br>required for surface<br>soils and                |                                  |  |

**Table 2: List and status of SWMUs and AOCs**

| <b>SWMU/<br/>AOC</b> | <b>SWMU/AOC<br/>Name</b>                                  | <b>Area<br/>(if<br/>applicable)</b> | <b>MDEQ Post-<br/>Closure Permit</b> | <b>No Further<br/>Action (NFA) /<br/>Basis for NFA</b> | <b>RCRA Facility<br/>Investigation (RFI)</b>                         | <b>Interim Measures<br/>(IM)</b> | <b>Corrective<br/>Measures Study<br/>(CMS)</b> |
|----------------------|---|-------------------------------------|--------------------------------------|--|--|----------------------------------|--|
|                      |   |                                     |                                      |  | groundwater  |                                  |  |
| 22                   | Large PCP Drip<br>Track                                   | Treatment<br>Area No. 1             |                                      |  | Supplemental RFI<br>required for surface<br>soils and<br>groundwater |                                  |  |
| 23                   | CCA Drip<br>Track   | Treatment<br>Area No. 1             |                                      |  | Supplemental RFI<br>required for surface<br>soils and<br>groundwater |                                  |  |
| 24                   | Large PCP<br>Tanks and their<br>Associated<br>Containment | Treatment<br>Area No. 1             |                                      |  | Supplemental RFI<br>required for surface<br>soils and<br>groundwater |                                  |  |
| 24A                  | Recovery Tank<br>#1                                       | Treatment<br>Area No. 1             |                                      |  | Supplemental RFI<br>required for surface<br>soils and<br>groundwater |                                  |  |
| 24B                  | Recovery Tank<br>#2                                       | Treatment<br>Area No. 1             |                                      |  | Supplemental RFI<br>required for surface<br>soils and<br>groundwater |                                  |  |
| 24C                  | Recovery Tank<br>#3                                       | Treatment<br>Area No. 1             |                                      |  | Supplemental RFI<br>required for surface<br>soils and<br>groundwater |                                  |  |
| 25                   | CCA Tanks and<br>their Associated<br>Containment          | Treatment<br>Area No. 1             |                                      |  | Supplemental RFI<br>required for surface<br>soils and<br>groundwater |                                  |  |
| 25A                  | Overflow Tank   | Treatment<br>Area No. 1             |                                      |  | Supplemental RFI<br>required for surface<br>soils and<br>groundwater |                                  |  |

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| <b>SWMU/<br/>AOC</b> | <b>SWMU/AOC<br/>Name</b> | <b>Area<br/>(if<br/>applicable)</b> | <b>MDEQ Post-<br/>Closure Permit</b> | <b>No Further<br/>Action (NFA) /<br/>Basis for NFA</b> | <b>RCRA Facility<br/>Investigation (RFI)</b>  | <b>Interim Measures<br/>(IM)</b> | <b>Corrective<br/>Measures Study<br/>(CMS)</b> |
|----------------------|--------------------------|-------------------------------------|--------------------------------------|--|---|----------------------------------|--|
| 25B                  | CCA Concentrate Tank     | Treatment Area No. 1                |                                      |  | Supplemental RFI required for surface soils and groundwater                                   |                                  |  |
| 25C                  | CCA Effluent Tank        | Treatment Area No. 1                |                                      |  | Supplemental RFI required for surface soils and groundwater                                   |                                  |  |
| 25D                  | CCA Work Tank #1         | Treatment Area No. 1                |                                      |  | Supplemental RFI required for surface soils and groundwater                                   |                                  |  |
| 25E                  | CCA Work Tank #2         | Treatment Area No. 1                |                                      |  | Needs additional surface soil investigation and groundwater investigation. (Supplemental RFI) |                                  |  |
| 26A                  | Small PCP Cylinder       | Treatment Area No. 2                |                                      |  | Supplemental RFI required for surface soils and groundwater                                   |                                  |  |
| 26B                  | Former Creosote Cylinder | Treatment Area No. 2                |                                      |  | Supplemental RFI required for surface soils and groundwater                                   |                                  |  |
| 26C                  | Small PCP Collection Pit | Treatment Area No. 2                |                                      |  | Supplemental RFI required for surface soils and groundwater                                   |                                  |  |
| 27                   | Small PCP Drip Track     | Treatment Area No. 2                |                                      |  | Supplemental RFI required for surface soils and groundwater                                   |                                  |  |



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| <b>SWMU/<br/>AOC</b> | <b>SWMU/AOC<br/>Name</b>                                  | <b>Area<br/>(if<br/>applicable)</b> | <b>MDEQ Post-<br/>Closure Permit</b> | <b>No Further<br/>Action (NFA) /<br/>Basis for NFA</b> | <b>RCRA Facility<br/>Investigation (RFI)</b>                         | <b>Interim Measures<br/>(IM)</b> | <b>Corrective<br/>Measures Study<br/>(CMS)</b> |
|----------------------|---|-------------------------------------|--------------------------------------|--|--|----------------------------------|--|
| 28                   | Small PCP<br>Tanks and their<br>Associated<br>Containment | Treatment<br>Area No. 2             |                                      |  | Supplemental RFI<br>required for surface<br>soils and<br>groundwater |                                  |  |
| 28A                  | Oil Recovery<br>Tank                                      | Treatment<br>Area No. 2             |                                      |  | Supplemental RFI<br>required for surface<br>soils and<br>groundwater |                                  |  |
| 28B                  | Work Tank   | Treatment<br>Area No. 2             |                                      |  | Supplemental RFI<br>required for surface<br>soils and<br>groundwater |                                  |  |
| 29                   | Wastewater<br>Treatment<br>Facility                       | Treatment<br>Area No. 2             |                                      |  | Supplemental RFI<br>required for surface<br>soils and<br>groundwater |                                  |  |
| 29A                  | Spent Carbon<br>Towers                                    | Treatment<br>Area No. 2             |                                      |  | Supplemental RFI<br>required for surface<br>soils and<br>groundwater |                                  |  |
| 29B                  | Spent Carbon<br>SAA                                       | Treatment<br>Area No. 2             |                                      |  | Supplemental RFI<br>required for surface<br>soils and<br>groundwater |                                  |  |
| 29C                  | Floc Sludge<br>Tank                                       | Treatment<br>Area No. 2             |                                      |  | Supplemental RFI<br>required for surface<br>soils and<br>groundwater |                                  |  |
| 29D                  | PCP Sludge<br>Tank  | Treatment<br>Area No. 2             |                                      |  | Supplemental RFI<br>required for surface<br>soils and<br>groundwater |                                  |  |

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| <b>SWMU/<br/>AOC</b> | <b>SWMU/AOC<br/>Name</b>           | <b>Area<br/>(if<br/>applicable)</b> | <b>MDEQ Post-<br/>Closure Permit</b> | <b>No Further<br/>Action (NFA) /<br/>Basis for NFA</b>            | <b>RCRA Facility<br/>Investigation (RFI)</b>                         | <b>Interim Measures<br/>(IM)</b> | <b>Corrective<br/>Measures Study<br/>(CMS)</b> |
|----------------------|------------------------------------|-------------------------------------|--------------------------------------|---|--|----------------------------------|--|
| 29E                  | Test Sandbed<br>Filter             | Treatment<br>Area No. 2             |                                      |   | Supplemental RFI<br>required for surface<br>soils and<br>groundwater |                                  |  |
| 29F                  | Drum<br>Accumulation<br>Area       | Treatment<br>Area No. 2             |                                      |   | Supplemental RFI<br>required for surface<br>soils and<br>groundwater |                                  |  |
| 29G                  | Floc Tanks                         | Treatment<br>Area No. 2             |                                      |   | Supplemental RFI<br>required for surface<br>soils and<br>groundwater |                                  |  |
| 30                   | Groundwater<br>Treatment<br>System |                                     |                                      | No evidence of<br>releases; 1993<br>HSWA Permit<br>determined NFA |  |                                  |  |
| 30A                  | Pumping Wells                      |                                     |                                      | No evidence of<br>releases; 1993<br>HSWA Permit<br>determined NFA |  |                                  |  |
| 30B                  | Recharge Wells                     |                                     |                                      | No evidence of<br>releases; 1993<br>HSWA Permit<br>determined NFA |  |                                  |  |
| 30C                  | Groundwater<br>Collection Basin    |                                     |                                      | No evidence of<br>releases; 1993<br>HSWA Permit<br>determined NFA |  |                                  |  |
| 30D                  | Aeration Basin                     |                                     |                                      | No evidence of<br>releases; 1993<br>HSWA Permit<br>determined NFA |  |                                  |  |
| 30E                  | Aeration Basin                     |                                     |                                      | No evidence of<br>releases; 1993                                  |  |                                  |  |

**Table 2: List and status of SWMUs and AOCs**

| <b>SWMU/<br/>AOC</b> | <b>SWMU/AOC<br/>Name</b>                  | <b>Area<br/>(if<br/>applicable)</b> | <b>MDEQ Post-<br/>Closure Permit</b> | <b>No Further<br/>Action (NFA) /<br/>Basis for NFA</b>            | <b>RCRA Facility<br/>Investigation (RFI)</b>                         | <b>Interim Measures<br/>(IM)</b> | <b>Corrective<br/>Measures Study<br/>(CMS)</b> |
|----------------------|---|-------------------------------------|--------------------------------------|---|--|----------------------------------|--|
|                      |   |                                     |                                      | HSWA Permit<br>determined NFA                                     |  |                                  |  |
| 30F                  | Clarifier                                 |                                     |                                      | No evidence of<br>releases; 1993<br>HSWA Permit<br>determined NFA |  |                                  |  |
| 30G                  | Discharge Tank                            |                                     |                                      | No evidence of<br>releases; 1993<br>HSWA Permit<br>determined NFA |  |                                  |  |
| 31                   | Stormwater<br>Containment<br>Basin        |                                     |                                      | No evidence of<br>releases; 1993<br>HSWA Permit<br>determined NFA |  |                                  |  |
| 32                   | Carbon<br>Concrete Ditch                  | Treatment<br>Area No. 2             |                                      |   | Supplemental RFI<br>required for surface<br>soils and<br>groundwater |                                  |  |
| 33                   | Boiler<br>Blowdown/<br>Process<br>Skimmer | Treatment<br>Area No. 2             |                                      |   | Supplemental RFI<br>required for surface<br>soils and<br>groundwater |                                  |  |
| 34                   | Cylinder Sludge<br>Drum Storage           |                                     |                                      | No evidence of<br>releases; 1993<br>HSWA Permit<br>determined NFA |  |                                  |  |
| 35                   | Dumpsters                                 |                                     |                                      | No evidence of<br>releases; 1993<br>HSWA Permit<br>determined NFA |  |                                  |  |
| 36                   | Surge Tanks                               |                                     |                                      | No evidence of<br>releases; 1993<br>HSWA Permit<br>determined NFA |  |                                  |  |

**Table 2: List and status of SWMUs and AOCs**

| <b>SWMU/<br/>AOC</b> | <b>SWMU/AOC<br/>Name</b>                     | <b>Area<br/>(if<br/>applicable)</b> | <b>MDEQ Post-<br/>Closure Permit</b> | <b>No Further<br/>Action (NFA) /<br/>Basis for NFA</b>   | <b>RCRA Facility<br/>Investigation (RFI)</b>                         | <b>Interim Measures<br/>(IM)</b>                 | <b>Corrective<br/>Measures Study<br/>(CMS)</b>            |
|----------------------|--|-------------------------------------|--------------------------------------|--|--|--|---|
| 37                   | Drainage<br>Ditches                          |                                     |                                      |  |  |  | CMS – Submitted,<br>but not yet<br>approved by the<br>EPA |
| 38/AOC<br>C          | PCP Spill/Area<br>of Dioxin<br>Contamination |                                     |                                      |  | Supplemental RFI<br>for groundwater                                  | Maintenance of<br>geotextile and<br>gravel cover |   |
| 39                   | Sump-Treating<br>Process Area                | Treatment<br>Area No. 2             |                                      |  | Supplemental RFI<br>required for surface<br>soils and<br>groundwater |  |   |
| 40                   | Former<br>Contaminated<br>Soil Pile          |                                     |                                      | Discovered in<br>2006 and removed<br>in 2007;<br>Groundwater and<br>soil data to date<br>show no residual<br>contamination;<br>this HSWA Permit<br>confirms NFA. |  |  |   |
| AOC A                | Treated Wood<br>Storage Area                 |                                     |                                      | NFA based on<br>2002 RFI   |  |  |   |
| AOC B                | Church House<br>Branch                       |                                     |                                      |  |  |  | Amendment to<br>CMS for Ecological<br>Risk Assessment     |